

Exhibit 3

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ABC Corporation I et al,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "A",

Defendants.

CASE NO. 1:20-cv-04806

Judge: Honorable Thomas M. Durkin

DECLARATION OF XIE RONGQING

I, Xie Rongqing, declare as follows:

1. I am over eighteen (18) years of age. I make this affidavit based on my own knowledge.
2. I am the owner of Dongguan Saibotan Nengyuan Keji (Energy Tech) Co. Ltd. ("Dongguan Saibotan"), which owns and operates the Amazon storefront Gyroor-US.
3. I have been in the business of manufacturing and marketing hoverboards for over 7 years.
4. I am very familiar with the exterior design of different types of hoverboards.
5. The accused product in this case is designed based on the D808,857 patent, which Dongguan Saibotan is authorized to use.
6. The accused product is different from the design in D737,723, D738,256, D785,112, D784,195 patents. The patterns on the standing pads, the wheels, the fenders, and other details are all different.
7. I highlighted some of the differences between the accused product and the D737,723, D738,256, D785,112, D784,195 patents from different angles in the comparison below.

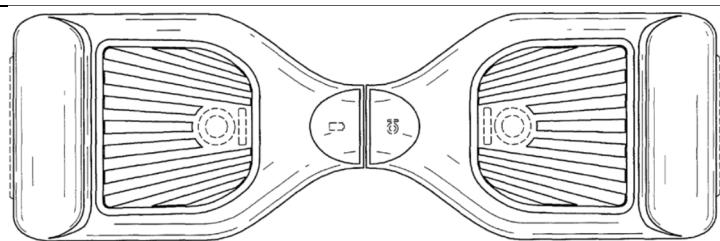
I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: 07/19/2021

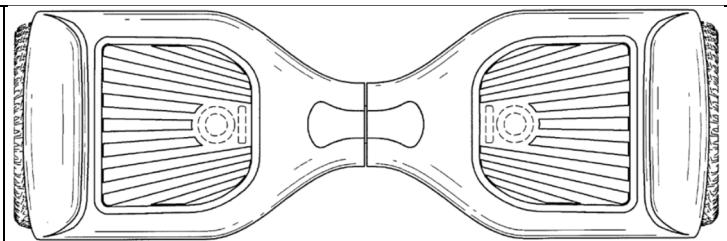
By: Xie Rong Qing

A. Top View Comparison

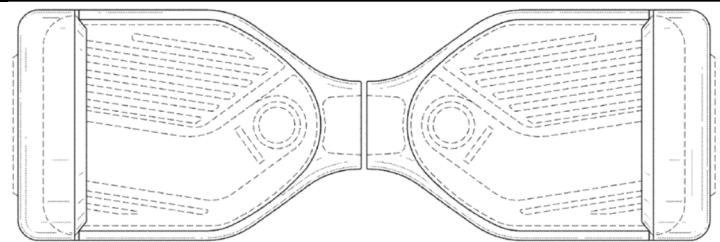
Plaintiffs' Patents-in-Suit



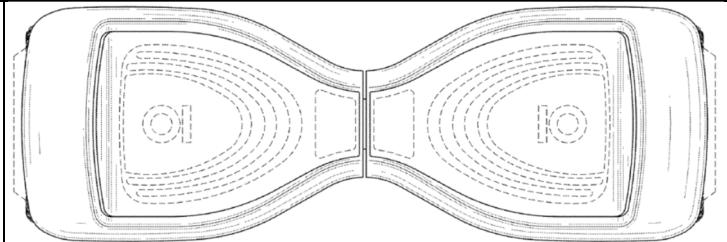
'D723 Patent



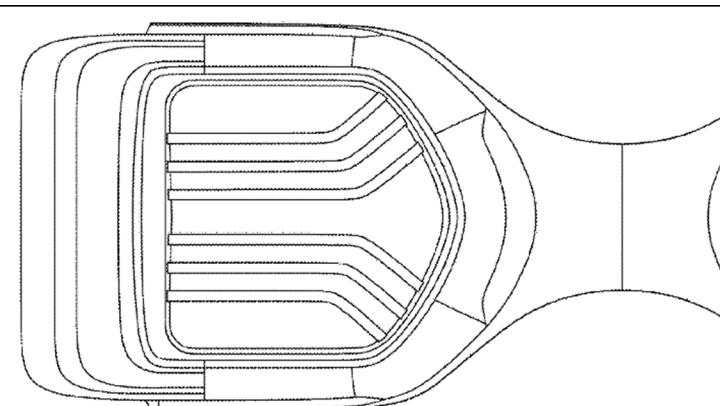
'D256 Patent



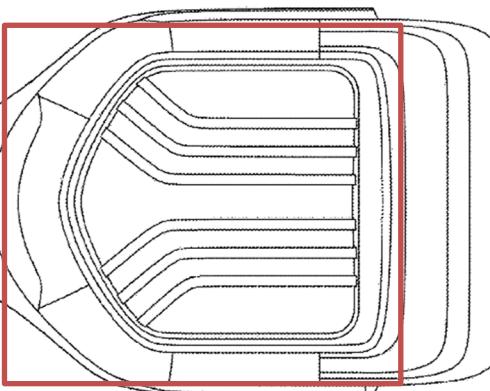
'D195 Patent



'D112 Patent



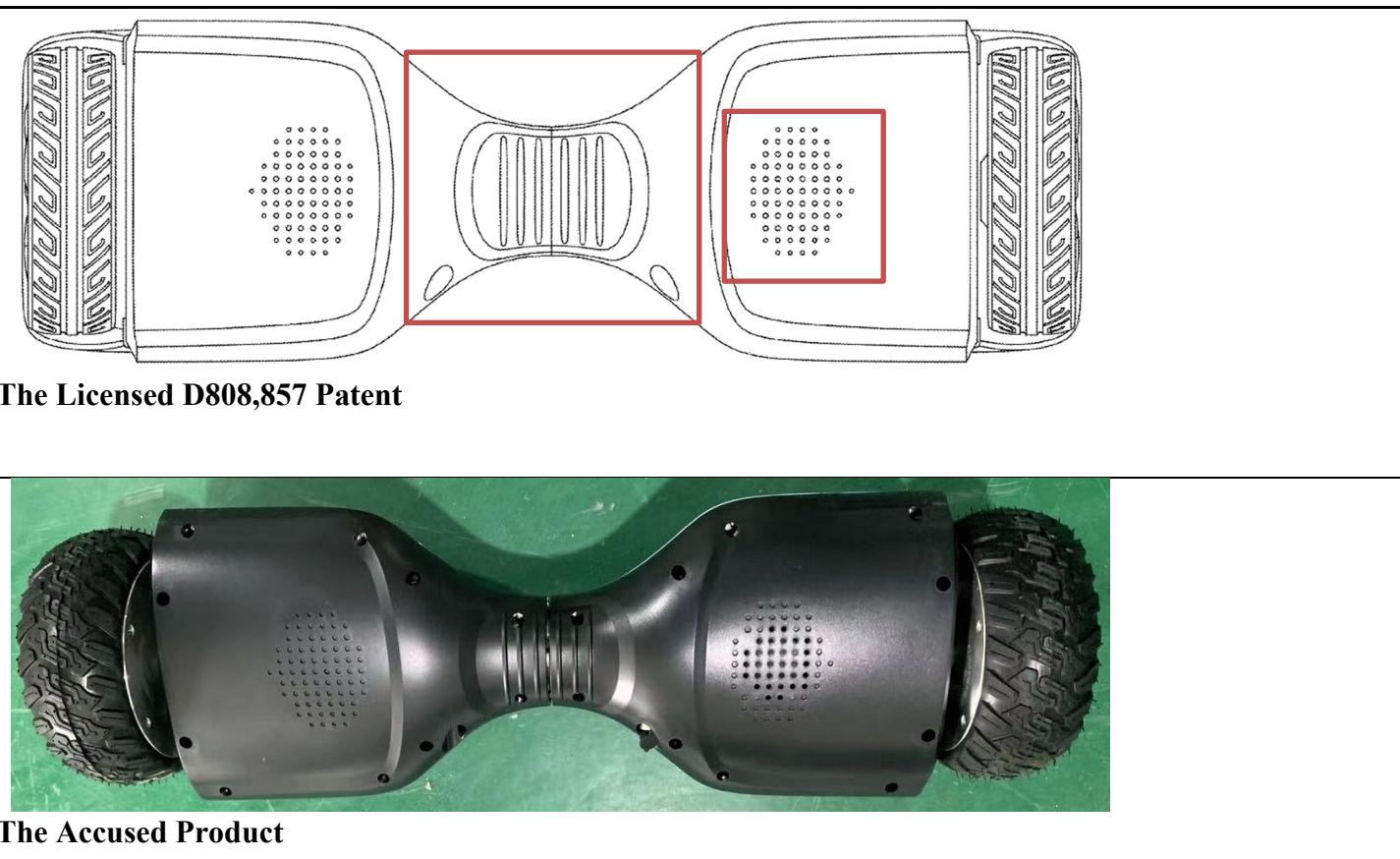
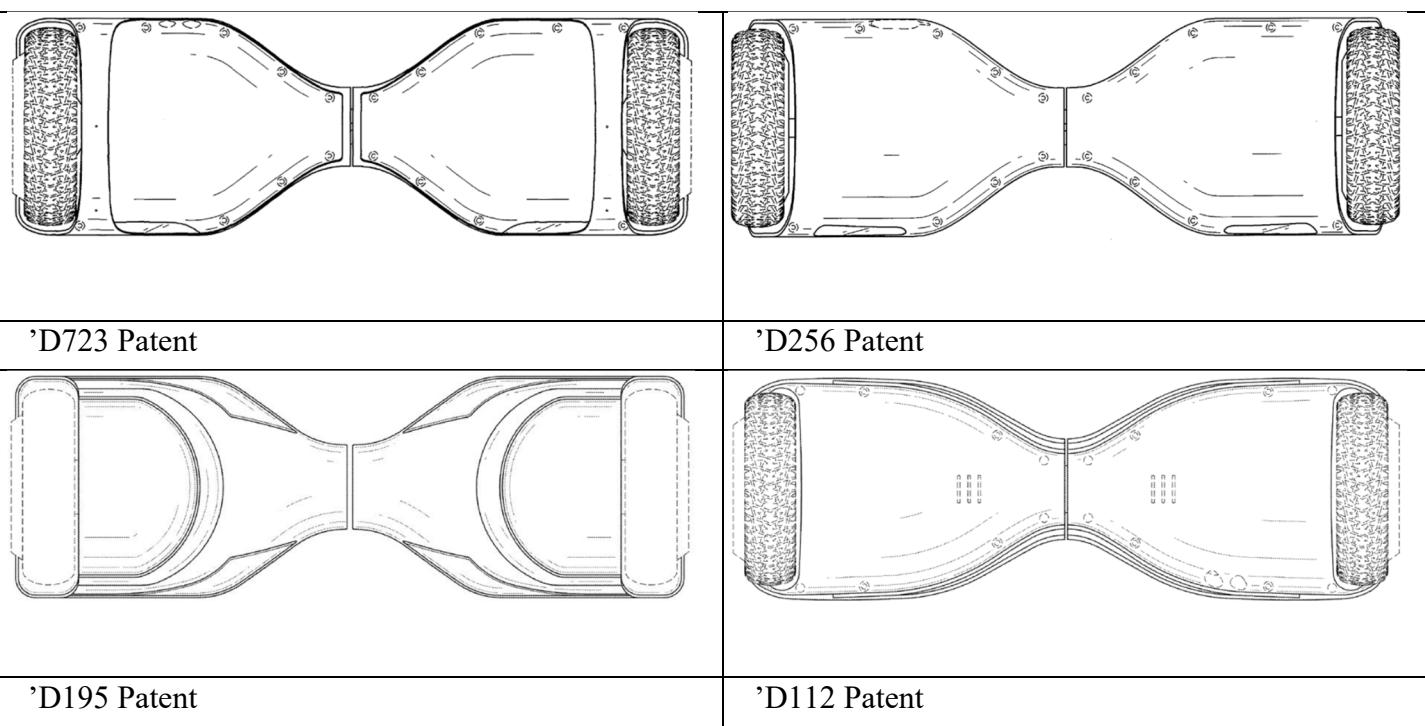
The Licensed D808,857 Patent



The Accused Product

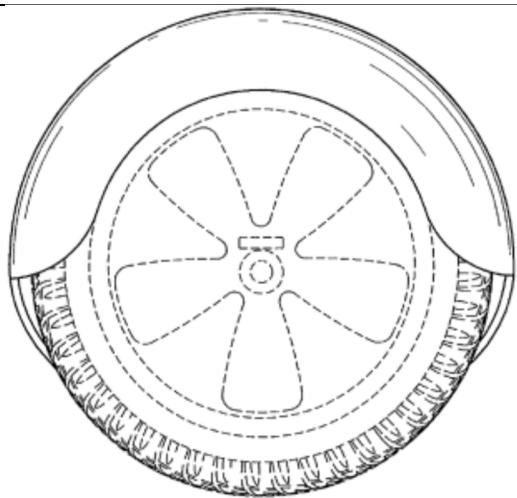
B. Bottom View Comparison

Plaintiffs' Patents-in-Suit

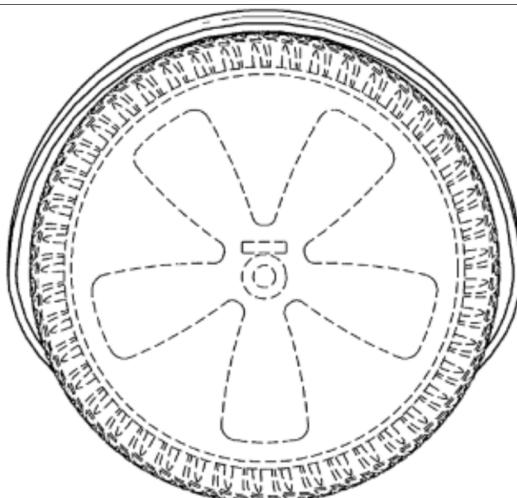


C. Side View Comparison (Wheels)

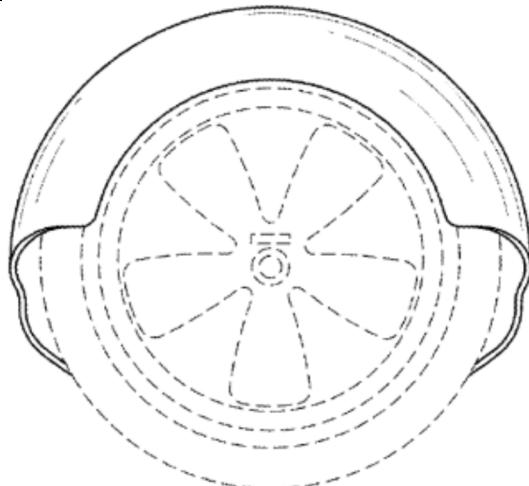
Plaintiffs' Patents-in-Suit



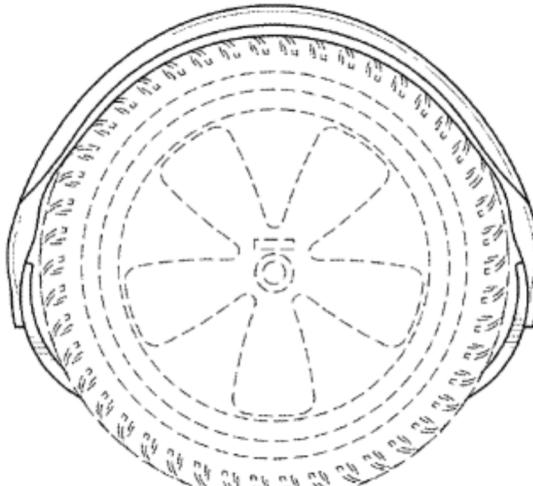
'D723 Patent



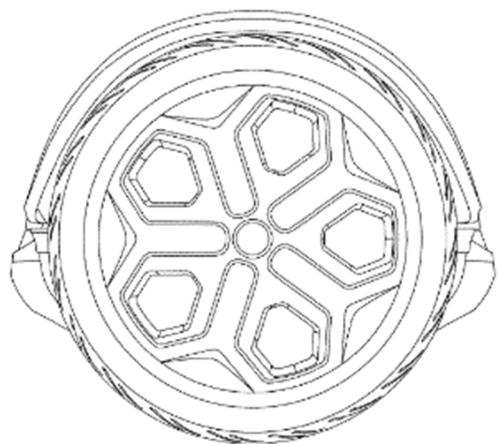
'D256 Patent



'D195 Patent



'D112 Patent



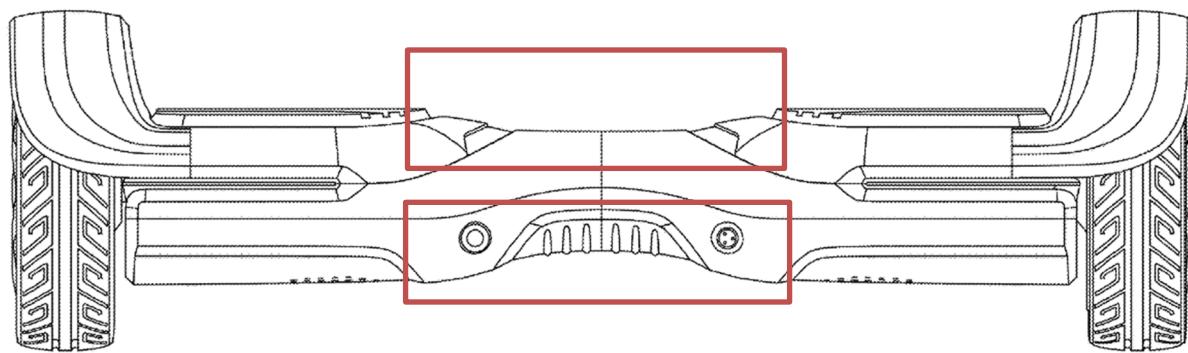
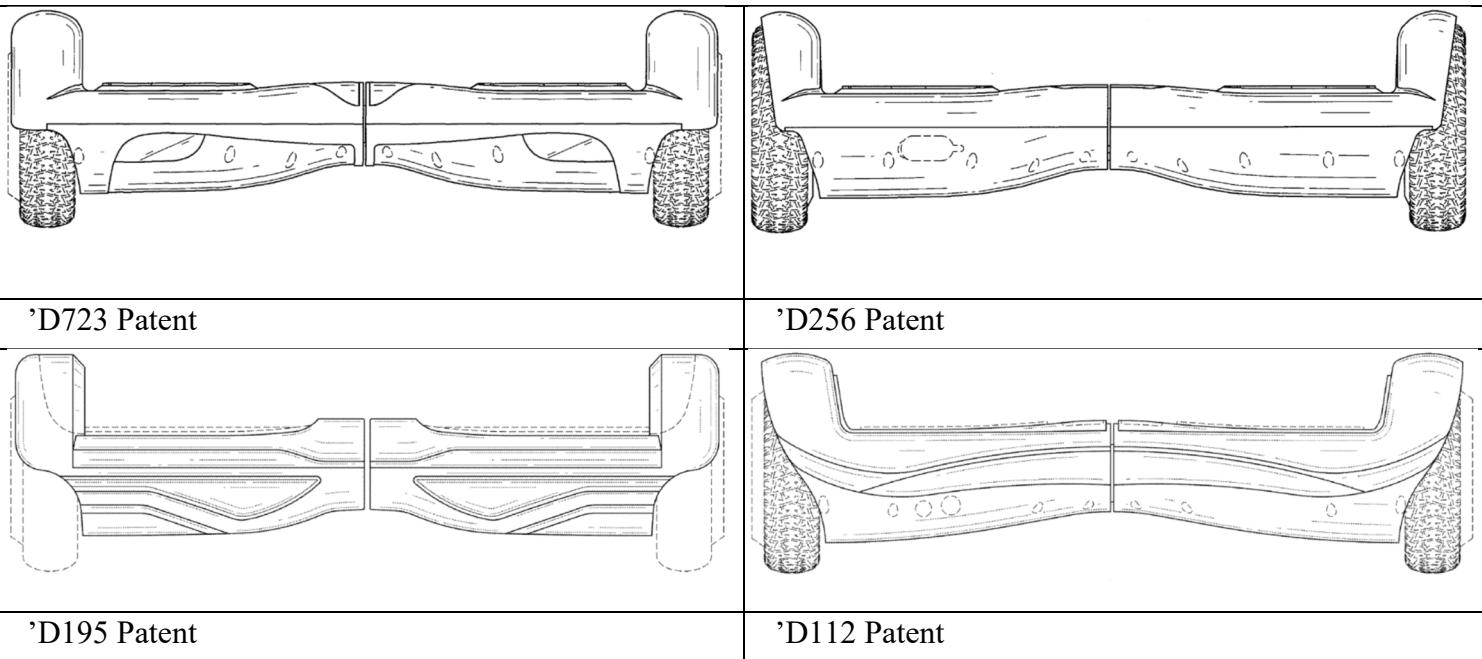
The Licensed D808,857 Patent



The Accused Product

D. Front / Back View Comparison

Plaintiffs' Patents-in-Suit



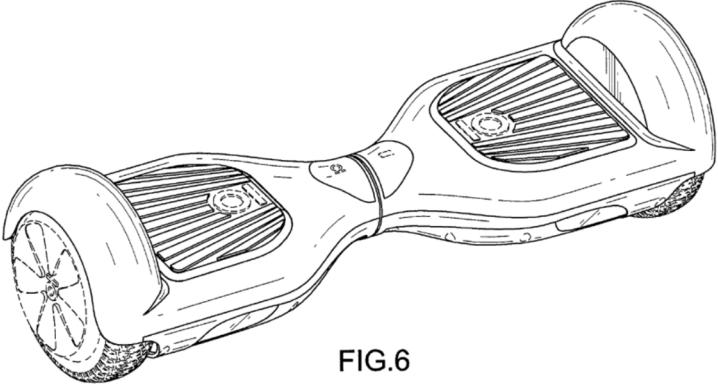
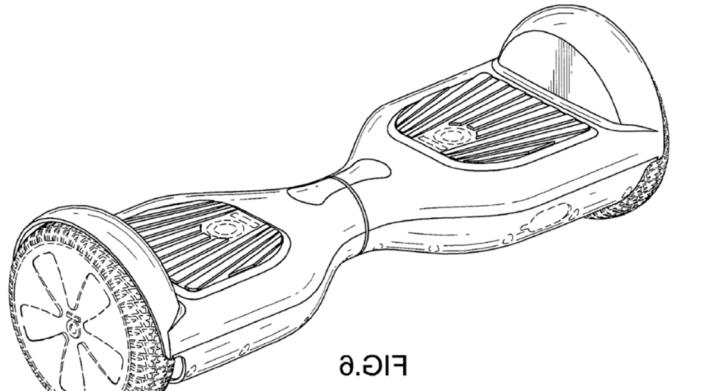
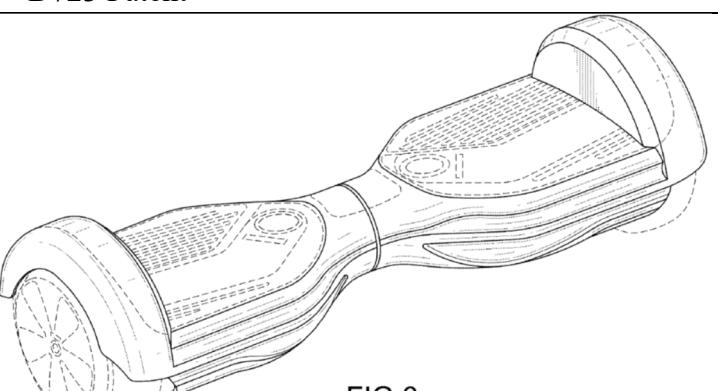
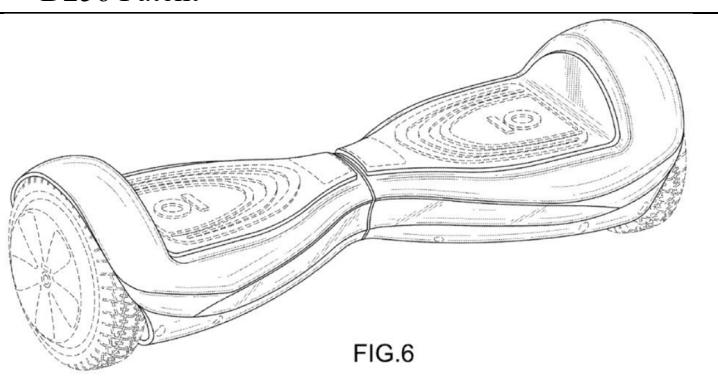
The Licensed D808,857 Patent

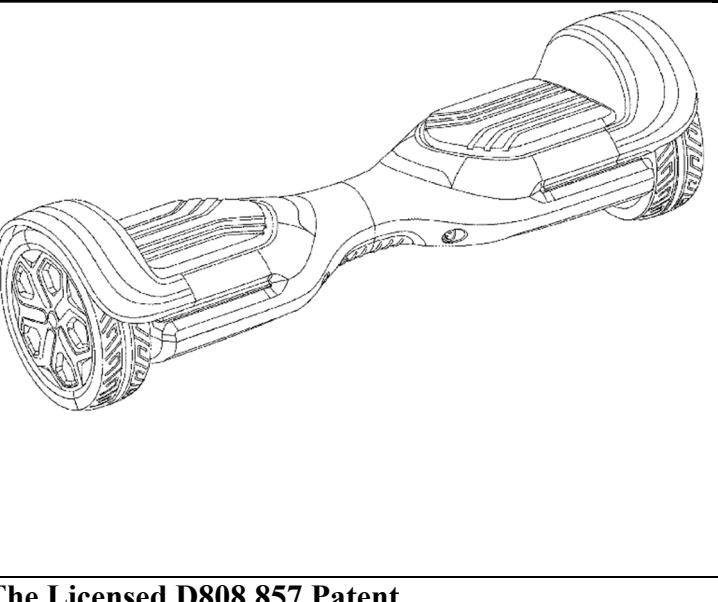


The Accused Product

E. Perspective View Comparison

Plaintiffs' Patents-in-Suit

	
'D723 Patent	'D256 Patent
	
'D195 Patent	'D112 Patent

	
The Licensed D808,857 Patent	The Accused Product